

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

In re:

**JULIANA RIAHI**

Debtor.

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\* Case No. 13-11487-RGM  
\* Chapter 7

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**NOTICE OF MOTION FOR TURNOVER, HEARING THEREON AND  
DEADLINE FOR FILING OPPOSITIONS THERETO**

**Donald F. King, Trustee** ("Trustee"), by counsel, has filed a motion for turnover for the property of the bankruptcy estate located a certain Safe Deposit Box jointly leased by the Debtor and Ana Vlalukin from Wells Fargo Bank, National Association. A copy of the motion and proposed consent order are attached hereto.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

**On or before THREE (3) DAYS BEFORE THE SCHEDULED HEARING DATE STATED BELOW**, file with the Court, at the address shown below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must **also** mail a copy to the persons listed below. The address for the Court is as follows:

Clerk of the Court  
U.S. Bankruptcy Court  
200 South Washington Street  
Alexandria, Virginia 22314

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LAUREN FRIEND MCKELVEY, ESQUIRE (VSB No. 78813)

Counsel for Trustee

ODIN FELDMAN & PITTELMAN PC

1775 Wiehle Avenue, Suite 400

Reston, Virginia 20190

Phone: 703-218-2135

Fax: 703-218-2160

[Lauren.Mckelvey@ofplaw.com](mailto:Lauren.Mckelvey@ofplaw.com)

A copy of any written response must be mailed to the following persons:

Lauren Friend McKelvey, Esquire  
Counsel for Donald F. King, Trustee  
ODIN FELDMAN & PITTELMAN PC  
1775 Wiehle Avenue, Suite 400  
Reston, Virginia 20190

You must also:

Attend the hearing scheduled to be held on **April 14, 2015, at 9:30 o'clock a.m.** at the United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. **If no timely response has been filed opposing the relief requested, the Court may grant the relief without holding a hearing.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

**DONALD F. KING, TRUSTEE**  
By Counsel

By: /s/ Lauren Friend McKelvey  
Lauren Friend McKelvey, Esquire (VSB No. 78813)  
Counsel for Trustee  
ODIN FELDMAN & PITTELMAN PC  
1775 Wiehle Avenue, Suite 400  
Reston, Virginia 20190  
Phone: 703-218-2135  
Fax: 703-218-2160  
[Lauren.McKelvey@ofplaw.com](mailto:Lauren.McKelvey@ofplaw.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing Notice, with Motion and proposed Order attached, was sent by U.S. mail, first class postage prepaid, on the 30th day of March, 2015, to the following:

Juliana Riahi  
1226 Potomac School Road  
McLean, VA 22101  
and  
39 Main Street  
Wachapreague, VA 23480

Richard L. Ferrell  
Senior Counsel  
Wells Fargo Law Dept.  
MAC: D1053-300  
301 South College Street  
Charlotte, NC 28288

Ana Vlalukin  
Apt 3A  
244 East 60<sup>th</sup> Street  
New York, N710022

Samantha Simmons Fredieu  
Counsel to Ana Vlalukin  
Hale Ball Carlson Baumgartner Murphy, PLC  
10511 Judicial Drive  
Fairfax, VA 22030

and via Notice of Electronic Filing upon Counsel to Debtor, the Office of the U.S. Trustee, Counsel for First Virginia Community Bank , and all registered users in this case pursuant to this Court's CM/ECF policy.

*/s/ Lauren Friend McKelvey*  
Lauren Friend McKelvey, Esquire

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